



156623
Ethyl Petroleum Additives
Sauget, Illinois 62201
(618) 274-4000

October 15, 1986

Mr. Nicholas Longo
On-Scene Coordinator
ATTN: 5HE-12
U.S.E.P.A. Region V
230 South Dearborn St.
Chicago, IL 60604

Dear Mr. Longo:

REF: Administrative Order V-W-84-007

Please find attached the results of 2,3,7,8-TCDD (Dioxin) analyses on four groundwater samples taken from four groundwater wells located at Ethyl Petroleum Additives Division (EPAD) Sauget facility. A "Well Documentation Report" on these wells was submitted to the Agency on September 10, 1986. Results of soil samples taken at Sample Point I (980N-430E) have not been completed. These results will be forwarded to the Agency when received.

Results of analyses on all four groundwater samples show no detectable amounts of 2,3,7,8-TCDD. Envirodyne Laboratories informs us that the procedure for analysis for the congeners of Dioxin in water samples at these concentrations is not reliable and subsequently confidence in the results would be questionable. The cost for performing these analyses would be approximately \$2000 per sample. We believe this is a severe cost to pay for analysis which may not be reliable and thus cause unnecessary additional analytical expenditures. Past analyses for congeners of Dioxin on soil samples taken from our facility have shown that the levels were below the concentration of 2,3,7,8-TCDD present in the sample. It would then be reasonable to conclude that at this facility the concentrations of the congeners in the well water samples would also be below the concentration of 2,3,7,8-TCDD present which was not detectable at the parts per trillion level. EPAD therefore reasonably concludes that contamination of the groundwater with 2,3,7,8-TCDD and/or its congeners at the Sauget facility does not exist and as stated in the letter from the Agency dated November 22, 1985, analysis of priority pollutants will not be required. Since no further sampling should be required of these wells, and to prevent possible contamination by surface water, we plan to have them sealed.

Mr. Nicholas Longo
U.S.E.P.A.

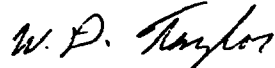
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EPAD now believes that this should conclude the final phase of investigation for Dioxin contamination at its Sauget facility. Extensive sampling and analysis of soil samples and the recent groundwater sampling and analysis verifies that the dioxin contamination at the site is limited to a small area, and that migration of dioxin from this area to other areas on or off the facility does not exist.

Most of the contaminated area has been sealed with asphalt and/or concrete. We believe at this time that sealing this area along with utilizing past approved work practices while working in the contaminated area is the only feasible remedial action that can be taken. EPAD will continue to notify the Agency if and when work will be done in the area designated as being significantly contaminated with 2,3,7,8-TCDD. As mentioned above previously approved work practices that address health and safety concerns, provisions for restricting the movement of soils, and the decontamination and disposition of materials while working in this area will continue to be utilized.

EPAD now believes that it has completed all of the prescribed actions relating to the above referenced administrative order and unless notified by the Agency plans no further action at this time. If you have any comments or questions on this matter please contact our Environmental Supervisor, Mr. M. J. Bonaventure at 618-274-4000.

Sincerely,



W.D. Taylor
Director of Operations

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